Dist 9/4/87 n.c.

THE MAZER CORPORATION

August 24, 1987

Ms. Ruth Mancos
U.S. EPA - Region V
CERCLA Enforcement Section (5HE-12)
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Mancos:

A few weeks ago, I spoke to Deborah Garber about a letter received by The Mazer Corporation concerning the sanitary land fill sight at 1855 Cardington Road, Montgomery County, Moraine, Ohio.

During our conversation, I made it clear that The Mazer Corporation does not have any records relative to the trash that was taken to the sight. However, I also made it clear that our products are nontoxic. Ms. Garber asked if I could submit some proof of that; so, attached are copies of test results performed by an independent lab.

Should you require any additional information, please let me know.

Sincerely,

David Mazer
President

DM/je

Enc: 2

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Ms. Ruth Mancos
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Masters

Hill Top Research, Inc.

Miamiville, Ohio 45147 (513) 831-3114

Ref.: 79-235-21
Mazer P. O. #33015

March 5, 1979

ACUTE ORAL TOXICITY POTENTIAL OF PRINTED AND BROWN PAPER EXTRACT

For International Corporate Services, Inc.

PURPOSE

This study was conducted to evaluate the acute oral toxicity potential of an extract of the test material in accordance with the techniques specified in the Regulations for the Enforcement of the Federal Hazardous Substances Act (Code of Federal Regulations, Title 16, Chapter II, 1976).

TEST MATERIAL

The sample was received from International Corporate Services, Inc. on February 2, 1979 for use in this study. Printed and Brown Paper are sheets of white printed paper with brown cover sheets.

PROCEDURE

Acute Oral Administration - Rats

The test sample extract was administered by esophageal intubation to five groups, each composed of five male Sprague-Dawley derived albino rats from Murphy Breeding Laboratories, Inc., weight range 200 to 277 grams. The sample was administered as an extract in distilled water at dosage levels of 1.00, 2.15, 4.64, 10.0 and 21.5 milliliters per kilogram of body weight.

An equal number of printed and brown cover sheets were shedded, and then 50 grams of the shedded paper were macerated with 200 ml of distilled water in a Waring Blender. The pulped material was incubated at 37°C for 24 hours; then, the pulped material was squeezed through a double thickness of cotton cloth. 195 ml of the extract was obtained.

Food was withheld from the rats for approximately 18 hours prior to dosage. Following dosage, food consisting of Purina Laboratory Chow and water were available ad libitum. The rats were housed in groups in stainless steel wire mesh cages suspended above the droppings. The animals were housed under a 12-hour light/12-hour dark cycle. All animals were observed closely for gross signs of systemic toxicity and mortality at frequent intervals during the day of dosage, and at least once daily thereafter for a total of 14 days. At the end of the 14-day observation period the rats were weighed, sacrificed by CO_2 inhalation and gross necropsies were performed.

RESULTS

Acute Oral Administration - Rats

No mortalities occurred during the course of the study. Therefore, the acute oral LD50 (lethal dose for 50% of the animals) was found to be greater than 21.5 ml/kg of body weight for male Sprague-Dawley derived albino rats.

At the 1.00, 2.15, 4.64 and 10.0 ml/kg dosage levels, all rats exhibited normal appearance and behavior throughout the day of dosage and continuing throughout the 14-day observation period.

At the 21.5 ml/kg dosage level, all the rats exhibited normal appearance and behavior immediately following dosage. Three and one-half hours and four and one-half hours following dosage all rats exhibited bluish appearing diarrhea and diarrhea stains. All the rats exhibited normal appearance and behavior from day 1 throughout the entire 14-day observation period.

Gross necropsies performed at the termination of the study revealed no gross pathological alterations in any of the rats at any of the dosage levels tested.

Average body weight changes for the rats are shown below:

Dose	Average Body Weight		
	Start	Finish	Gain
ml/kg	gm	gm	gm
1.00	229	360	131
2.15	250	379	129
4.64	228	355	127
10.0	238	359	121
21.5	244	367	123

Ref.: 79-235-21
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March 5, 1979

SUMMARY

The acute oral toxicity potential of Printed and Brown Paper extract was evaluated in accordance with the techniques specified in the Regulations for the Enforcement of the Federal Hazardous Substances Act (Code of Federal Regulations, Title 16, Chapter II, 1976).

The acute oral LD50 of Printed and Brown Paper extract was found to be greater than 21.5 ml/kg of body weight for male Sprague-Dawley derived albino rats.

Based on these results, Printed and Brown Paper extract is classified as not toxic by oral ingestion, as these terms are defined in the above-cited Regulations.

Submitted by Susan Osmanski
Susan Osmanski
Junior Technician, Toxicology

Approved by Marian B. Vinegar
Marian B. Vinegar, Ph.D.
Technical Director, Toxicology

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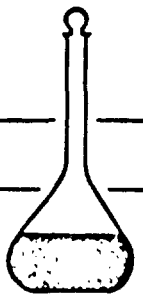

Hill Top Research

Miamiville, Ohio 45147 (513) 831-3114

IMPORTANT NOTICE

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SAMPLE DISPOSAL PROCEDURE

At the conclusion of a test program, two units of each sample used will be stored and remaining samples will be destroyed. No materials will be maintained longer than six months after the completion of the study unless the client notifies Hill Top - Toxicology.

New drugs are exempt from the above procedure. They will be retained or returned to the client.

Craft Ink

Hill Top - Toxicology

Miamiville, Ohio 45147 (513) 831-3114

77-168-21 May 4, 1977

ACUTE ORAL TOXICITY STUDY OF
SAMPLE 794-B

For The Mazer Corporation

PURPOSE

This study was conducted to evaluate the acute oral toxicity of the test material in accordance with the techniques specified in the Regulations for the Enforcement of the Federal Hazardous Substances Act (Code of Federal Regulations, Title 16, Chapter II, 1976).

TEST MATERIAL

The sample was received from The Mazer Corporation on February 10, 1977 for use in this study. Sample 794-B is a semi-solid, very dark blue ink.

PROCEDURE

The test sample was administered orally by stomach tube to one group, composed of ten male Sprague-Dawley derived albino rats (Harlan Industries, Inc., weight range 242 to 270 grams). The sample was administered undiluted at a dosage level of 2.9 milliliters per kilogram of body weight which is equivalent to the required 5 grams per kilogram of body weight in the above-cited Regulations, calculated as follows:

$$\text{Dose in ml/kg} = \frac{5 \text{ g/kg}}{\text{Specific Gravity } (1.695) \text{ mg/ml}} = 2.9 \text{ ml/kg}$$

Food was withheld from the rats for approximately 18 hours prior to dosage. Following dosage, food consisting of commercial pellets and water were available ad libitum. The rats were housed in groups in wire mesh cages suspended above the droppings. All animals were observed closely for gross signs of systemic toxicity and mortality at frequent intervals during the day of dosage, and at least once daily thereafter

for a total of 14 days. At the end of the 14-day observation period, the surviving rats were weighed, sacrificed by CO_2 inhalation, and gross necropsies were performed.

RESULTS

No mortalities occurred at the dosage level tested. Therefore, the acute oral LD_{50} (lethal dose for 50% of the animals) was found to be greater than 2.9 ml/kg (5 g/kg) of body weight for male albino rats.

At the 2.9 ml/kg dosage level, two rats exhibited black stains on their tails during the post-dosage days 5 through 12. On post-dosage days 5 and 6, two rats and one rat, respectively, exhibited soft stool. Otherwise, all rats exhibited normal appearance and behavior on the day of dosage and during the observation period.

The average body weight change for the rats was a 108 gram gain (finish average 360 grams minus start average 252 grams). The average body weight gain was within the normal limits for the rats of the age, sex, and strain used in this study.

Necropsies performed at termination revealed no significant gross pathological alterations.

SUMMARY

The acute oral toxicity potential of Sample 794-B was evaluated in accordance with the techniques specified in the Regulations for the Enforcement of the Federal Hazardous Substances Act (Code of Federal Regulations, Title 16, Chapter II, 1976).

The acute oral LD_{50} (lethal dose for 50% of the animals) for male albino rats was found to be greater than 2.9 ml/kg (5 g/kg) of body weight.

Based on these results, Sample 794-B is classified as non-toxic by oral ingestion as this term is defined in the above-cited Regulations.

Hill Top-Toxicology

Submitted by

Robert T. Newsome
Robert T. Newsome
Junior Technician, Toxicology

Approved by

Marian B Vinegar
Marian B. Vinegar, Ph.D.
Director, Toxicology

IBR

International Bio-Research, Inc.
Hannover, Germany Cincinnati, Ohio USA

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IMPORTANT NOTICE

International Bio-Research, Inc. submits this report with the understanding that no portion of it will be used for advertising or promotion without obtaining our prior written consent to the specific proposed use. When such use is desired we will be glad to assist in the preparation of mutually acceptable excerpts or summaries.

SAMPLE DISPOSAL PROCEDURE

At the conclusion of a test program, two units of each sample used will be stored and remaining samples will be destroyed. No materials will be maintained longer than six months after the completion of the study unless the client notifies International Bio-Research, Inc.

New drugs are exempt from the above procedure. They will be retained or returned to the client.